

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Vasquez

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-MJ-00072-DB
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) PRELIMINARY HEARING AND EXCLUDE
VINCENT JOSE VASQUEZ,) TIME
Defendant.) Date: June 24, 2021
) Time: 2:00 a.m.
) Judge: Deborah Barnes

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney David Spencer, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Vincent Jose Vasquez, that the preliminary hearing currently set for June 24, 2021 at 2:00 **be continued to July 22, 2021, at 2:00 p.m.**

The parties specifically stipulate as follows:

1. The Complaint in this case was filed on May 5, 2021, and defendant first appeared before a judicial officer of the Court in which the charges in this case were pending on May 6, 2021. The court set a preliminary hearing date of May 20, 2021.
2. At the joint request of the parties, on May 12, 2021, the Court signed an order to continue the preliminary hearing to June 11, 2021.

3. At the joint request of the parties, on June 7, 2021, the Court signed an order to continue the preliminary hearing to June 24, 2021.
4. Since the last continuance, the defense has been reviewing discovery; the parties have been actively involved in plea negotiations; and defense counsel was out of the district for one week investigating another case and unable to work on the instant matter.
5. The parties jointly move for an additional extension of time of the preliminary hearing date to July 22, 2021, at 2:00 p.m., before the duty Magistrate Judge.
6. For the reasons stated above, the parties agree that good cause exists for the extension of time and that it would not adversely affect the public interest in the prompt disposition of criminal cases. *See* FRCP 5.1(d).
7. For the reasons states above, the parties further agree that the interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Failure to grant a continuance would deny the parties the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Therefore, the parties request that the time between June 24, 2021, and July 22, 2021, be excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: June 21, 2021

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Vasquez

Date: June 21, 2021

PHILLIP A. TALBERT
United States Attorney


/s/ David Spencer
DAVID SPENCER
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 22, 2021



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE